

#2 1545

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CHRISTINE ANN KEBR

)
)
)
)
)

Criminal No. 12-288
(18 U.S.C. §371)

INFORMATION

The United States Attorney charges:

At all times material to this Information:

1. The City of Pittsburgh (hereinafter "City") was a local government as defined by Title 18, United States Code, Section 666(a)(1).

2. The City of Pittsburgh Bureau of Police (hereinafter "Police Department") was a department of the City of Pittsburgh and thus a "government agency", as defined by Title 18, United States Code, Section 666(d)(2).

3. The City and the Police Department received, during the calendar years 2006, 2007, 2008 and 2009, benefits in excess of \$10,000 under federal programs involving grants, contracts, subsidies or loans.

4. The defendant, CHRISTINE ANN KEBR, was a resident of the Western District of Pennsylvania and an employee of the City of Pittsburgh and thus an "agent" of the City as defined by Title 18, United States Code, Section 666(d)(1).

5. Victory Security was a company located in the Western District of Pennsylvania and was controlled by AB, a person known to the United States Attorney.

6. Alpha Outfitters, LLC (hereinafter "Alpha Outfitters") was a company located in the Western District of Pennsylvania.

THE CONSPIRACY AND ITS OBJECTS

7. From in and around September 2006, and continuing thereafter until in and around December 2009, in the Western District of Pennsylvania and elsewhere the defendant, CHRISTINE ANN KEBR, knowingly and willfully did conspire, combine, confederate and agree together with AB, a person known to the United States Attorney, to commit an offense against the United States, that is Bribery Concerning Programs Receiving Federal Funds, in violation of Title 18, United States Code, Section 666(a)(1)(B).

MANNER AND MEANS OF THE CONSPIRACY

8. It was a part of the conspiracy that in and around the summer of 2006, the City of Pittsburgh initiated a review to outsource the duties of the City Radio Shop, which included the installation of radios and mobile data terminals (MDTs), as a cost savings measure.

9. It was further a part of the conspiracy that on or about September 15, 2006, the defendant, CHRISTINE ANN KEBR, met with AB and an individual known to the United States Attorney to discuss the creation of a business in which the defendant, CHRISTINE ANN KEBR, AB and another individual known to the United States Attorney would each be a partner with the purpose to obtain a contract to work on Pittsburgh Police vehicles.

10. It was further a part of the conspiracy that on or about October 27, 2006, the defendant, CHRISTINE ANN KEBR, met with AB and an individual known to the United States Attorney to further discuss the creation of the business set out in paragraph 9, above. During the meeting, they discussed business costs, locations, and the specifics of installing MDTs. It was agreed that the defendant, CHRISTINE ANN KEBR, would assist in the preparation of bid documents.

11. It was further a part of the conspiracy that in and around the fall of 2006, the defendant, CHRISTINE ANN KEBR, met with AB wherein AB stated that he was creating a new company, Alpha Outfitters, to bid for the contract and that the company would be owned by a "straw" owner, an individual known to the United States Attorney.

12. It was further a part of the conspiracy that in and around March 2007, the defendant, CHRISTINE ANN KEBR, in her role as a City employee, assisted in the preparation of a Request for Proposal by the City of Pittsburgh for the installation and maintenance of MDTs and other emergency equipment in City owned vehicles (hereinafter "equipment contract").

13. It was further a part of the conspiracy that in and around May 2007, the defendant, CHRISTINE ANN KEBR, met with AB at the offices of Victory Security and assisted in drafting the bid of Alpha Outfitters that was submitted to the City in order to obtain the equipment contract. The bid falsely represented that Alpha Outfitters was a wholly owned Women's Business Enterprise (WBE). The

names of the defendant, CHRISTINE ANN KEBR, and AB did not appear in any of the paperwork supporting the bid.

14. It was further a part of the conspiracy that in and around July 2007, the defendant, CHRISTINE ANN KEBR, in her role as a City employee, reviewed the bid from Alpha Outfitters and recommended that it be accepted. The City subsequently awarded the equipment contract to Alpha Outfitters.

15. It was further a part of the conspiracy that in and around December 2007, AB gave the defendant, CHRISTINE ANN KEBR, an envelope containing \$3,000 in cash as payment for her assistance in obtaining the equipment contract.

16. It was further a part of the conspiracy that between September 2006 through 2009, the City paid Alpha Outfitters approximately \$327,729.40 for the installation of equipment under the equipment contract.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects of the conspiracy, the defendant, CHRISTINE ANN KEBR, and AB, did commit and cause to be committed, the following overt acts, among others, in the Western District of Pennsylvania:

(a) On or about September 15, 2006, the defendant, CHRISTINE ANN KEBR, met with AB and an individual known to the United States Attorney to discuss the creation of a business in order to obtain a contract to work on Pittsburgh Police vehicles.

(b) On or about October 2, 2006, a business having the same address as AB's residence, Renaissance Day Spa of Robinson, LLC, filed paperwork with the Pennsylvania Department of State to change its name to Alpha Outfitters, LLC. On December 7, 2006, Alpha Outfitters, LLC, changed its address to the same address as Victory Security.

(c) In and around December of 2006, the defendant, CHRISTINE ANN KEBR, supervised the installation of MDTs by Alpha Outfitters as a demonstration to the City of Alpha Outfitters' performance.

(d) On or about February 9, 2007, the City paid Alpha Outfitters for the MDT installation by check mailed to Alpha Outfitters at the business address of Victory Security.

(e) In and around March 2007, the defendant, CHRISTINE ANN KEBR, assisted in the creation of a Request for Proposal (hereinafter "RFP") for the installation and maintenance of MDTs and the emergency equipment in city owned vehicles.

(f) In and around April 2007, AB advised the defendant, CHRISTINE ANN KEBR, that since he could not pay her directly her share in Alpha Outfitters, that AB would pay her spouse and show the spouse as an employee. The defendant, CHRISTINE A. KEBR, declined this arrangement.

(g) In and around May 2007, Alpha Outfitters signed a lease for a garage located at 3327 West Carson Street, Pittsburgh,

Pennsylvania, to install MDTs in City vehicles. This arrangement was coordinated by AB.

(h) In and around May 2007, the defendant, CHRISTINE A. KEBR, met AB at the offices of Victory Security and assisted in the preparation of Alpha Outfitters' bid for the equipment contract. The bid listed Alpha Outfitters as a Women's Business Enterprise and did not include the names of AB or the defendant, CHRISTINE A. KEBR.

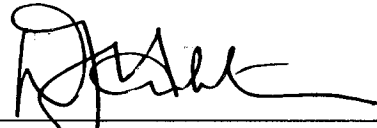
(I) On or about July 27, 2007, the defendant, CHRISTINE A. KEBR, recommended that the City award the equipment contract to Alpha Outfitters.

(j) From on or about December 8, 2006, to on or about July 28, 2008, the defendant, CHRISTINE A. KEBR, assisted in the creation of invoices and work statements for Alpha Outfitters, to submit to the City for payment, which inflated the amount of work performed by Alpha Outfitters.

(k) In and around December 2007, AB provided \$3,000 to the defendant, CHRISTINE A. KEBR.

(l) From on or about October 24, 2007, to on or about December 15, 2009, the defendant, CHRISTINE ANN KEBR, and AB, caused the City to pay Alpha Outfitters approximately \$327,229.40 under the equipment contract.

All in violation of Title 18, United States Code, Section 371.



DAVID J. HICKTON
United States Attorney
PA ID NO.34524